



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 08/03/2005
Time Start 10:00
Time Finish 12:30
eFACTS INSP # 1469489

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR☐ S Q GENERATOR

Company name B. BRAUN MEDICAL, INC. I.D. Number PAD 982679169
Site Address 901 MARCON BLVD. ALLENTOWN PA 18109-9341
County LEHIGH Municipality HANOVER TOWNSHIP Zip 18109
Name of Inspector DAVID J. ELM
Name & Title of Responsible Official STEPHEN STANICK ENVIRONMENTAL HEALTH & SAFETY MANAGER
Person Interviewed SAME, DAVID R. LAYER, JOSEPH BATTERSON Telephone (610) 691-5400
Mailing Address (if different from above) _____
Amount of Hazardous Waste Generated per Month: 72200 Pounds _____ Kgs

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad2. Universal Waste: ☐ Large Quantity Handler ☒ Small Quantity HandlerUniversal Waste Types LAMPS

3. Hazardous Waste Transporters:

Transporter Name ST. JOSEPH MOTOR LINES License Number PA AH0390
Transporter Name FREEHOLD CARTAGE License Number PA AH0067
Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
<u>F002, D001</u>	<u>WASTE FLAMMABLE LIQUIDS</u>	<u>EQ Resource Recovery Inc</u>
		<u>MID060775844</u>
<u>F002</u>	<u>WASTE FLAMMABLE SOLIDS</u>	<u>Von Roll WTI, Inc.</u>
		<u>CHD980613541</u>
<u>D001, F005</u>	<u>WASTE AEROSOLS, WASTE FLAMMABLE</u>	<u>ENVIRONMENTAL ENTERPRISE INC</u>
	<u>LIQUID</u>	<u>CHD082777010</u>

ORIGINAL: PA DEP REGION II (NERO) FILE-WM-LEHIGH CO.-B. BRAUN MEDICAL, INC.-INSPECTIONS
CC: FACILITY ✓
PA DEP BETHLEHEM D.O.-WM-LEHIGH CO. B. BRAUN MEDICAL, INC.-INSPECTIONS
PA DEP CENTRAL OFFICE-BLR&WM-DIV. OF HAZ. WASTE MGT.
USEPA REGION III/RRIS Page 1 of 6

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS**

Site Name B. BRAUN Medical Inc ID Number PA0922679169 Date 08-03-2005
 1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
/				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
/				Containers of hazardous waste in good condition	265a.1	265.171	H026
/				Containers and stored waste compatible	265a.1	265.172	H027
/				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
/				Containers managed to prevent leaks	265a.1	265.173(b)	H029
/				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
/				Container storage areas inspected at least weekly	265a.1	265.174	H031
/				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
/				Proper containment and collection systems in place	265a.179		H033
/				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
/				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
/				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
/				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA
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BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name B. BRAUN Medical, Inc. ID Number PA0982679169 Date 08-07-2005

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
/				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
/				Identification Number	262a.10	262.12	H002
/				Authorized transporters only	262a.10	262.12(c)	H003
/				Subsequent notification requirements met	262a.12(b)		H004
/				Proper manifest used	262a.10	262.21	H005
/				Manifests filled out correctly and completely	262a.20		H006
/				Manifests signed and routed properly	262a.23(a)	262.23	H007
/				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	2			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	2			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
/				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
/				Personnel training program per 265.16 complied with <u>11/02/2004, 08/02/2005</u>	262a.10	262.34(a)(4) 262.34(d)	H012
/				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
/				Specified records retained for three years	262a.10	262.40(c)	H014
/				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
/				Exception reporting procedures followed	262a.42	262.42	H016
/				Spill reporting procedures followed	262a.10	262.34(d)	H017
/				PPC plan developed and implemented	262a.10	262.34(a)	H018
	2			Special requirements followed for international shipments	262a.10	262.50 262.60	H019
/				Source reduction strategy prepared and available (LQG only)	262a.100		H020
/				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Hazardous Waste Inspection Report
Hazardous Waste Permit by Rule Facility

Company name B. BRAUN Medical Inc.

I.D. Number PAD 982679169

Determination of Applicability Required? 270a.60	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N.D.	<input checked="" type="checkbox"/>
Documentation Available?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N.D.	<input type="checkbox"/>
Does facility accept wastes from off-site for treatment in the PBR system?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	N.D.	<input type="checkbox"/>
Does facility have an NPDES permit?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	N.D.	<input type="checkbox"/>
If yes, NPDES Permit Number _____						
If no, does facility discharge to a sewage treatment system with an NPDES permit? If yes, NPDES Permit Number _____	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	N.D.	<input type="checkbox"/>
If yes, does system meet all Federal, State and local pretreatment standards?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N.D.	<input type="checkbox"/>

If system does not directly discharge to a POTW or its own NPDES permitted discharge, explain here.

ETHYLENE GLYCOL RESIDUAL WASTE IS SHIPPED OFFSITE TO COASTLINE CHEMICAL, INC., 30470 ENERGY DRIVE, NEW CHURCH, VA 23415

Site Name B. BRAUN MEDICAL INC ID Number PAD 982679169 Date 06-07-2005

Hazardous Waste Inspection Report
Hazardous Waste Permit by Rule Facility (WWTP)

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NUMBER
/				Facility has applied for or received an EPA Hazardous Waste Identification Number	264a.1	264.11	H550
/				Active portion has 24 hour surveillance	264a.1	264.14(b)(1)	H551
/				Artificial barrier surrounds active portion	264a.1	264.14(b)(2)	H552
/				Proper signs are posted	264a.1	264.14(c)	H553
/				Inspections are conducted as per inspection plan	264a.1	264.14(b)(1)	H554
/				Inspection schedule is retained at facility	264a.1	264.15(b)(2)	H555
/				Deterioration and/or malfunctions of equipment corrected as revealed by inspections	264a.1	264.15 (c)	H556
/				Immediate remedial action taken when a hazard is imminent or already present	264a.1	264.15(c)	H557
/				Inspection log is maintained and utilized properly	264a.1	264.15 (d)	H558
/				Personnel training plan approved by DEP and implemented	264a.1	264.16 (a)	H559

B. BRAUN Medical, Inc.
 PAD 982679169
 08-09-2005

Hazardous Waste Inspection Report **Hazardous Waste Permit by Rule Facility (WWTP)**

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NUMBER
/				Facility has NPDES permit if required	264a.1	264.16(d)(e)	H560
/				Facility is equipped with internal alarm system capable of providing immediate emergency instruction to personnel	264a.1	264.32(a)	H561
/				Facility is capable of summoning outside emergency assistance	264a.1	264.32(b)	H562
(Facility is equipped with fire, spill and decontamination control equipment	264a.1	264.32(c)	H563
(Facility communication and/or alarm systems, and spill and decontamination control equipment is periodically tested and maintained	264a.1	264.33	H564
(Adequate aisle space is maintained to allow unrestricted access for personnel and emergency equipment	264a.1	264.35	H565
/				Current PPC plan, prepared and implemented in accordance with Department's guidelines. Copy available on site.	264a.1	264.51	H566
/				Designated primary emergency coordinator and is on-site or on call at all times	264a.1	264.55	H567

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 02 AUGUST 2005Identification Number PAD982679169Company/Facility/Site Name B. BRAUN MEDICAL, INC.

I INSPECTED THE SITE WITH MESSRS. STANWICK, LAVER AND PATTERSON OF THE SITE. THE SITE, A MANUFACTURER OF DISPOSABLE PLASTIC MEDICAL DEVICES, IS A LARGE QUANTITY GENERATOR OF HAZARDOUS WASTE. I TOURED THE SITE, INCLUDING THE WASTE STORAGE AREAS, AND, ELEMENTARY NEUTRALIZATION PERMIT-REQUIRED AREA. A REVIEW OF THE SITE RECORDS WAS ALSO CONDUCTED DURING THE INSPECTION.

THE ELEMENTARY NEUTRALIZATION SYSTEM GENERATES ETHYLENE GLYCOL FROM A PROCESS INVOLVING THE MIXING OF SULFURIC ACID/WATER AND ETHYLENE OXIDE. ETHYLENE OXIDE IS UTILIZED IN THE STERILIZATION OF OUTBOUND PACKAGED PRODUCTS.

THE SITE PRC PLAN IS TITLED THE "HAZARDOUS MATERIALS OFFSITE RESPONSE PLAN 2005". THE PLAN ~~APPEARS TO~~ CONTAINS THE NECESSARY EMERGENCY CONTACT TELEPHONE NUMBERS PER THE REQUIREMENTS OF THE DEPARTMENT. THE PLAN, DATED 03/02/2005, IS WRITTEN IN ACCORDANCE WITH THE SARA TITLE III REQUIREMENTS.

ONE ^{55-GALLON} DRUM OF HAZARDOUS WASTE METHYLENE CHLORIDE DATED 02/20/2005 WAS NOTED IN THE HAZARDOUS WASTE STORAGE AREA. FIVE 55-GALLON CONTAINERS OF RESIDUAL WASTE (2 OF WASTE FLUO LAMPS, 1 RORA EMPTY CONTAINER AND 2 OF WASTE LIGHT BALLASTS) WERE ALSO ONSITE THE FACILITY.

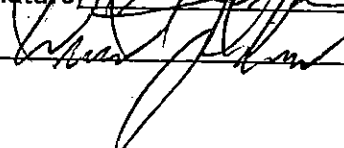
ONE CONTAINER OF CONSTRUCTION/DEMOLITION WASTES AND SEVERAL ITEMS OF ELECTRONIC SCRAP WERE ALSO NOTED DURING THE INSPECTION.

THIS CONCLUDES THE INSPECTION REPORT COMMENTS.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Date 08/03/2005Inspector (signature) Date 08/02/2005

PROCESS UNIT DETAIL

Add New Unit Group or Detail Record ☐Modify Existing Unit Group or Detail Record ☐Delete Existing Unit Group or Detail Record ☐

Permit Process

Unit Group

Seq. No.

Permit Process

Unit Group

Name

Process Data

Detail Seq.

No.

Permit

Process Code

Effective Date

Permit Sub-
Process CodeNumber
of Units

Capacity

Unit's
MeasureSub-Unit of
Measure

Legal Status

Operating Status

Commercial Status

Comments:

These are new fields in RCRIS used to provide additional detail about a unit group.

PROCESS UNIT DETAIL

Add New Unit Group or Detail Record ☐Modify Existing Unit Group or Detail Record ☐Delete Existing Unit Group or Detail Record ☐

Permit Process

Unit Group

Seq. No.

Permit Process

Unit Group

Name

Process Data

Detail Seq.

No.

Permit

Process Code

Effective Date

Permit Sub-
Process CodeNumber
of Units

Capacity

Unit's
MeasureSub-Unit of
Measure

Legal Status

Operating Status

Commercial Status

Comments:

These are new fields in RCRIS used to provide additional detail about a unit group.

EVENT
DETAILAdd New Event ☒Modify Existing Event ☐Delete Existing Event ☐Link Event to Above
Unit Group ☒Unlink Event to
Above Unit Group ☐

Permit Seq. No.

001

Permit

Processing No.

PIAD19181261791169

Event

Name

Permit Approved

Event

Code

01P200

Responsible
AgencyEvent Seq.
No.

011

Responsible
Person

[]

Event Status
Code

PI

EPA
Responsible
Person

[]

State
Responsible
Person

[]

EPA
Attorney

[]

State
Attorney

[]

Originally
Scheduled Date

[]

[]

[]

[]

Scheduled
Date

[]

[]

[]

[]

Actual
Date

10

16

[]

191

Comments:

ENTERED 12/8/97 call

RCRIS PERMIT/CLOSURE/POST CLOSURE

Unit Group and Event Data Entry Form

Version 2.0

Handler Data	Handler ID	PIAD191812617911619	Name of Facility	B Braun Medical Inc.
--------------	------------	---------------------	------------------	----------------------

PROCESS UNIT DETAIL	Add New Unit Group or Detail Record <input checked="" type="checkbox"/> Modify Existing Unit Group or Detail Record <input type="checkbox"/> Delete Existing Unit Group or Detail Record <input type="checkbox"/>						
	Permit Process Unit Group Seq. No.	11	Permit Process Unit Group Name	PERMIT big ITALIE 111			
	Process Data Detail Seq. No.	0101	Permit Process Code	T101			
	Effective Date	11 16 1997	Permit Sub-Process Code	11			
	Number of Units	00000001	Capacity	4000.00			
	Unit of Measure	G	Sub-Unit of Measure				
Legal Status	RIU	Operating Status	OIP	Commercial Status	<input type="checkbox"/>	Comments:	Approved PBR for elementary Neutralization
These are new fields in RCRIS used to provide additional detail about a unit group.							

PROCESS UNIT DETAIL	Add New Unit Group or Detail Record <input type="checkbox"/> Modify Existing Unit Group or Detail Record <input type="checkbox"/> Delete Existing Unit Group or Detail Record <input type="checkbox"/>						
	Permit Process Unit Group Seq. No.	11	Permit Process Unit Group Name				
	Process Data Detail Seq. No.		Permit Process Code				
	Effective Date		Permit Sub-Process Code				
	Number of Units		Capacity				
	Unit of Measure		Sub-Unit of Measure				
Legal Status		Operating Status		Commercial Status	<input type="checkbox"/>	Comments:	
These are new fields in RCRIS used to provide additional detail about a unit group.							

KEY:	Required Fields	<input type="checkbox"/>	Field Required if Pertinent	<input type="checkbox"/>	Optional Fields	<input type="checkbox"/>
	Submitted By: _____ Date: _____					
	Checked By: _____ Date: _____					
Entered By: _____ Date: _____						



Department of Environmental Protection
Northeast Regional Office
Two Public Square
Wilkes-Barre, PA 18711-0790



ATTN NAOMI HENRY

~~(314W62)~~

US EPA REGION III

1650 ARCH ST

PHILADELPHIA PA 19103-2029

3WC31 10th floor

19103X2029 01





Pennsylvania Department of Environmental Protection

4530 Bath Pike
Bethlehem, PA 18017
March 31, 2001

Bethlehem District Office

610-861-2070
Fax 610-861-2072

NOTICE OF VIOLATION

Certified Mail No. 7099 3400 0000 8559 9178

B Braun Medical, Incorporated
901 Marcon Boulevard
Allentown, PA 18103-9341

Attn: Stephen S. Stancick, E. H. and S. Manager

Re: February 20, 2001 Inspection
B Braun Medical
PAD 982 679 169
Hanover Township
Lehigh County

Dear Mr. Stancick:

As a result of a February 20, 2001 inspection at the above referenced facility, the Department of Environmental Protection (DEP) has determined that you are in violation of the Solid Waste Management Act, Act of July 7, 1980, P.L. 380, No. 97, 35 P.S. Section 6018.101 et seq., and the Hazardous Waste Management Rules and Regulations found at 40 C.F.R. Parts 260 to 270 incorporated by reference at 25 PA Code Chapters 260a to 270a.

- 1.) B Braun Medical accumulated hazardous waste onsite for more than 90 days in violation of 40 CFR Part 262.34(a) as incorporated by 25 PA Code Chapter 262a.10. Five (5), 55 gallon drums of hazardous waste were accumulated onsite for more than 90 days.
- 2.) B Braun Medical failed to manage containers of hazardous waste in compliance with 40 C.F.R. Part 265 Subpart I and 25 PA Code Chapter 265(a) Subchapter I in violation of 40 C.F.R. Part 262.34 as incorporated by 25 PA Code 262a.10. (See violations below)



- 3.) B Braun Medical failed to keep containers of hazardous waste closed in violation of 40 CFR Part 265.173(a) as incorporated by 25 PA Code Chapter 265a.1. Bags of waste rags with solvent were noted to be partly open during the inspection.
- 4.) B Braun Medical failed to insure proper container configuration and spacing for safe management and access for inspection purposes in violation of 25 PA Code Chapter 265a.173. Bags of waste rags with solvent blocked aisles and access to several containers of hazardous waste in the accumulation storage area.
- 5.) B Braun Medical failed to inspect the hazardous waste accumulation storage area weekly in violation of 40CFR part 265.174 as incorporated by 25 PA Code Chapter 265a.1. The facility has not conducted and documented an inspection of the waste accumulation storage area since October 16, 2000.
- 6.) B Braun Medical failed to insure that air emission standards were being complied with in violation of 40 CFR Part 265.178 as incorporated by 25 PA Code Chapter 265a.1. Bags of hazardous waste rags with solvent were partly open during the inspection.
- 7.) B Braun Medical failed to mark containers of hazardous waste with an accumulation date in violation of 40 C.F.R. 262.34(a)(2) as incorporated by 25 PA Code Chapter 262a.10. Approx. Dozen (12) bags of waste rags with solvent lacked an accumulation date on the bag.
- 8.) B Braun Medical failed to label the waste containers with 'Hazardous Waste' labels in violation of 40 C.F.R. Part 262.34(a)(3) as incorporated by 25 PA Code Chapter 262a.10. Approx. Dozen (12) bags of waste rags with solvent lacked a 'Hazardous Waste' label.
- 9.) B Braun Medical failed to label containers of waste to accurately identify the contents of the containers in violation of the SWMA 6018.403(b)(2).

You are notified of both the existence of the violations as well as the need to provide prompt correction. Failure to correct the violations may result in legal proceedings under the Solid Waste Management Act. Under the Act, each day of the violation is considered a distinct and separate offense and will be handled accordingly.

Within fourteen (14) days of receipt of this notice, please submit a proposed plan and schedule to DEP for correction of the violations.

B Braun Medical, Inc.

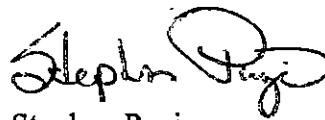
-3-

March 31, 2001

This Notice of Violation is neither an order nor any other final action of the Department of Environmental Protection. It neither imposes nor waives any enforcement action available to the Department under any of its statutes. If the Department determines that an enforcement action is appropriate, you will be notified of the action.

If you have any questions about this letter, please contact me at the above phone number.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen Puzio". The signature is fluid and cursive, with a large loop at the end.

Stephen Puzio
Solid Waste Specialist
Waste Management Program

Bcc: NERO file via W. Tomayko
BDO file via C. Gitschier
J. Lehman
R. Ducceschi
S. Puzio
EPA Region III

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 02/20/2001 Identification Number PAD 982679169Company/Facility/Site Name B Braun Medical, Inc.Violations (continue)

blocked aisles and access to containers of
hazardous waste in the accumulation storage area.

5.) B Braun Medical failed to inspect the
hazardous waste accumulation storage area weekly
in violation of 40 CFR Part 265.174 as incorporated
by 25 PA code Chapter 265a.1. The facility had not
been conducting weekly inspections of the storage area. The
last documented inspection of the storage area occurred
on October 16, 2000.

6.) B Braun Medical failed to insure that air
emission standards were being complied with (AA, BB, CC)
in violation of 40 CFR Part 265.178 as incorporated by
25 PA code Chapter 265a.1. Several bags of hazardous
waste solvent bags were partly open.

7.) B Braun Medical failed to clearly mark containers
of hazardous waste with accumulation dates in violation
of 40 CFR Part 262.34(a)(2) as incorporated by
25 PA code Chapter 262a.10. Approx twelve (12) bags
of solvent bags lacked an accumulation date.

8.) B Braun Medical failed to label containers of
hazardous waste with a hazardous waste label.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does knowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) [Signature] Date 03/12/01Inspector (signature) [Signature] Date 03/12/2001

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 02/20/2001 Identification Number PAD 982679169Company/Facility/Site Name B Brown Medical, Inc.

Violations (continue)

in violation of 40 CFR Part 262.34 (a)(3) as incorporated
by 25 PA code Chapter 262a.10. Approx twelve (12)
bags of solvent rags lacked a "hazardous waste"
label.

9.) B Brown Medical failed to accurately identify
the contents of containers of hazardous waste
stored in the accumulation area in violation of
SWMA 1018-403 (b)(2). Approx twelve (12)
bags of solvent rags lacked any identification labels.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does knowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) [Signature] Date 03/14/01Inspector (signature) [Signature] Date 03/21/2001



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 1/30/02Time Start 10:15 AMTime Finish 12:55 PMInsp. Id 1093870

HAZARDOUS WASTE INSPECTION REPORT



GENERATOR



S Q GENERATOR

Company name B Braun Medical, Inc I.D. Number PAD 982679169Site Address 901 Marcon Blvd. Allentown PA 18103-9341County Lehigh Municipality Hanover Twp Zip 18103-9341Name of Inspector Rebecca BellName & Title of Responsible Official M Kiani - Vice President of OperationsPerson Interviewed Stephen Sterrick, Dave Lauer, Joe Patterson Telephone (610) 266-0500Mailing Address (if different from above) SameAmount of Hazardous Waste Generated per Month: 2200 Pounds _____ Kgs

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____PBR: ☒ Neutralization/WWTP ☐ Reclaim Other _____GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad2. Universal Waste: ☐ Large Quantity Handler ☒ Small Quantity HandlerUniversal Waste Types Fluorescent lamps → switched to green lamps

3. Hazardous Waste Transporters:

Transporter Name DART Trucking Company, Inc. License Number PA-AH 0219Transporter Name St. Joseph Motor Lines License Number PA-AH 0390Transporter Name Midwest Environmental Transport, Inc. License Number PA-AH 0368

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
F002	RQ Waste Flammable Solid - ^{methylen} Chloride	OH0980613541 Von Roll America, Inc.
D001	RQ Waste Flammable Liquid - Isopropyl	Chemical Conservation of Georgia
F002	RQ Waste Flammable Liquid - ^{c. Isopropyl} Alcohol	GA0293380814
D001	RQ Waste Flammable Liquid - Hydraulic oil & mineral spirits	
D001, D002, D009	(D002) Corrosive liquid - acidic, basic, waste (D009) Carbon tetrachloride	OH0283377010 Environmental Enterprises, Inc.

Notes: NERO - Wm files - inspection file PAD 982679169

cc: BOO via C. Gitschler

EPA

facility

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name B. Braun Medical, Inc. ID Number PA0 932679169 Date 1/30/02

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
/				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
/				Identification Number	262a.10	262.12	H002
/				Authorized transporters only	262a.10	262.12(c)	H003
/				Subsequent notification requirements met	262a.12(b)		H004
/				Proper manifest used	262a.10	262.21	H005
/				Manifests filled out correctly and completely	262a.20		H006
/				Manifests signed and routed properly	262a.23(a)	262.23	H007
/				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
/	2			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
/	2			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
/				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
/				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
/				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
/				Specified records retained for three years	262a.10	262.40(c)	H014
/				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
/				Exception reporting procedures followed	262a.42	262.42	H016
/				Spill reporting procedures followed	262a.10	262.34(d)	H017
/				PPC plan developed and implemented	262a.10	262.34(a)	H018
/				Special requirements followed for international shipments	262a.10	262.50 262.60	H019
/				Source reduction strategy prepared and available (LQG only)	262a.100		H020
/				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS.
FACILITY SPECIFICS**

Site Name B. Brown Medical, Inc. ID Number PA098267911-9 Date 1/30/02

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
/				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
/				Containers of hazardous waste in good condition	265a.1	265.171	H026
/				Containers and stored waste compatible	265a.1	265.172	H027
/				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
/				Containers managed to prevent leaks	265a.1	265.173(b)	H029
/				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
/				Container storage areas inspected at least weekly	265a.1	265.174	H031
/				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
/				Proper containment and collection systems in place	265a.179		H033
/				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
/				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
/				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
/				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection ID 1095871

Field Code _____

INSPECTION REPORT – RESIDUAL WASTE GENERATOR

Site I.D.: PAD 982679169
 Site Name: B Braun Medical, Inc.
 Address: 901 Maroon Boulevard
Allentown, PA 18103-9341
 Municipality: Hanover Twp
 Responsible Official: Al Kiani
 Person Interviewed: Stephen Stanick, Dave Lauer, Joe Rette
 Inspector: Rebecca Bell
 eFACTS ID #: PF _____ SF _____

Telephone #: (610) 266-0500
 Operator Name: _____
 Address: _____
 County: Lehigh County
 Title: Vice President of Operations
 Title: Sanitation Manager / EHS Supervisor / EHS Coordinator
 Title: Solid Waste Specialist

Inspection Date: 01/30/2002 Type: routine No. of Violations: None Time: 10:15 AM

Waste Description: <u>Waste plastic, paper, and other municipal waste-like waste</u>	Waste Code: <u>R400</u>
Treatment: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Type: _____
Type of Storage: <input checked="" type="checkbox"/> Containers <input type="checkbox"/> Tanks <input type="checkbox"/> Piles <input type="checkbox"/> Impoundments	
Disposition: Destination Facility <u>China Landfill / BFI, Inc.</u>	
Location: <u>Easton, PA / Morgantown, PA</u>	Type: <u>landfills</u>
Amount Generated: <u>657 71 tons in 1998</u>	
Waste Description: _____	Waste Code: _____
Treatment: <input type="checkbox"/> Yes <input type="checkbox"/> No	Type: _____
Type of Storage: <input type="checkbox"/> Containers <input type="checkbox"/> Tanks <input type="checkbox"/> Piles <input type="checkbox"/> Impoundments	
Disposition: Destination Facility _____	
Location: _____	Type: _____
Amount Generated: _____ lb./mo.	
Waste Description: _____	Waste Code: _____
Treatment: <input type="checkbox"/> Yes <input type="checkbox"/> No	Type: _____
Type of Storage: <input type="checkbox"/> Containers <input type="checkbox"/> Tanks <input type="checkbox"/> Piles <input type="checkbox"/> Impoundments	
Disposition: Destination Facility _____	
Location: _____	Type: _____
Amount Generated: _____ lb./mo.	
Waste Description: _____	Waste Code: _____
Treatment: <input type="checkbox"/> Yes <input type="checkbox"/> No	Type: _____
Type of Storage: <input type="checkbox"/> Containers <input type="checkbox"/> Tanks <input type="checkbox"/> Piles <input type="checkbox"/> Impoundments	
Disposition: Destination Facility _____	
Location: _____	Type: _____
Amount Generated: _____ lb./mo.	

1 - No Violation Observed 2 - Not-Applicable 3 - Not-Determined 4 - Non-Compliance

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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection January 30, 2002Identification Number PAD 982 679 169Company/Facility/Site Name B Braun Medical, Inc. 901 Marcon Blvd., Allentown, PA 18103-9341

I conducted a routine large quantity hazardous waste generator and a residual waste generator inspection on January 30, 2002 from 10:15 a.m.-12:55 p.m. at B Braun Medical, Inc. Jonathan Ulanoski and Brian Hilliard were also present for the Department. Stephen Stancick, Dave Lauer, and Joe Patterson of B Braun Medical, Inc. were present during the inspection. B Braun Medical, a listed large quantity generator of hazardous waste, manufactures plastic disposable medical devices at this facility.

During the site inspection, the hazardous waste storage area was inspected. There were spill kits located at the hazardous waste storage area. A satellite accumulation area for methylene chloride contaminated rags was observed. The residual waste is picked up by Raritan Valley. The corrugated cardboard and paper are recycled through Raritan Valley. The sharps that are generated on site are picked up weekly by SMI. No problems were observed during the site inspection.

B Braun Medical's hazardous waste, residual waste and infectious waste manifests were examined and appear to be in order. The training records are up-to-date. The Source Reduction Strategy for hazardous waste and residual waste were last updated on August 23, 1999. The PPC plan was updated on March 23, 2001 (B Braun Medical updates annually). The hazardous waste biennial report was inspected during the last inspection of the facility.

No violations noted.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) mailed

Date _____

Inspector (signature) Rebecca A BellDate 2/19/02